

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELEWARE

FILED
JUN 10 2004
AM 10:00
U.S. BANKRUPTCY COURT
DISTRICT OF DELEWARE

In re:

W.R. GRACE & CO., et. Al.

Debtors.

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Chapter 11

Cause No. 01-01139

AFFIDAVIT OF JOHN E. WALL, JR.

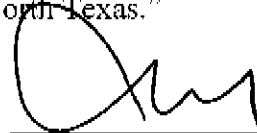
BEFORE ME, the undersigned authority, personally appeared John E. Wall, Jr., who being duly sworn, testified as follows:

"My name is John E. Wall, Jr. I am at least 18 years of age and of sound mind. I am personally acquainted with the facts alleged herein.

On May 21, 2004, I received a facsimile from my clients Michelle Archer and David Archer which included the Notice of Filing of Debtor's Fifth Omnibus Objection to Claims (Substantive). I was also noticed that I should file a response to the Objection on or before June 4, 2004 at 4:00 p.m. Eastern Time. Although we had received previous communication from Counsel for the Debtors, we were not favored with a copy of this communication by Counsel for the Debtors, but received our copy from my clients.

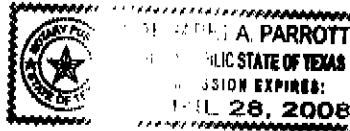
On Tuesday, June 1, 2004 at approximately 9:00 p.m., a massive thunderstorm hit the Dallas/ Fort Worth Metroplex. I was working at my office at that time when the power outage occurred. My office was without power until June 3, 2004 at approximately 9:00 a.m., and the office was not running at full capacity until June 4, 2004 at approximately 12:00 noon. Therefore, I was unable to draft and serve these Responses to Debtor's Fifth Omnibus Objection to Claims (Substantive) until the afternoon of June 4, 2004.

I have attached an article to this affidavit printed from the Dallas Morning News to attest to the massive power outages throughout North Texas."



John E. Wall, Jr.

SUBSCRIBED AND SWORN TO BEFORE ME on the 4th day of June, 2004.



Notary Public, State of Texas

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document has been served on opposing counsel as follows via facsimile on this the 4th day of June, 2004.

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John E. Wall, Jr.

DallasNews.com

The Dallas Morning News

Power coming back in North Texas, but thousands still in the dark

02:39 PM CDT on Friday, June 4, 2004

By KIMBERLY DURNAN / DallasNews.com

Some 155,000 North Texas customers were still without electricity Friday morning after violent storms on Tuesday and Wednesday nights.

TXU Electric Delivery is using 3,300 workers from nine states to cut the outages from a high of a half million homes and businesses, spokeswoman Carol Peters said.

"We are working around the clock ... to restore service to home and businesses that were affected by the worst storm in our history," she said.

The remaining outages should be restored by midday Saturday.

Outages should be reported to (888) 313-4747 or the telephone number on the customer's electric bill. Those who need critical care or other assistance or information about social services and shelters should call 211.

"We encourage residents to be safe without power and seek shelter where it's cool," Peters said. "TXU would like to caution everyone to exercise caution around downed power lines. Do not go near them and report them to the fire department."

Jason Caldwell, who lives in the Lower Greenville area, said he was elated when his power was returned early Friday, after 52 hours with no electricity.

"I was going to be pretty angry to get home from work today and still not have electricity," he said. "The most frustrating thing has been to see power on across the street. We lost all the food in our refrigerator. We tried to put it on ice but it melted. We are just going to cut our losses."

Tuesday's powerful storms brought winds at 80 to 90 mph, toppling trees and power lines as it left its mark on a broad swath of North Texas. Heavy rains dumped 2 to 3 inches in Tarrant County and up to an inch and a half in Dallas County. Wednesday's storms compounded problems bringing more rain, winds and power outages.

Preliminary estimates set losses at \$100 million, said Sandra Ray, public affairs director for the Southwestern Insurance Information Service.

Also Online

Generators are hot commodities following outages

Parks' tree damage from storms called worst in decades

Tree services kick into overdrive following storm

Track the weather:

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- ~~TXU~~ Forecasts for 110 Texas cities

The Dallas area should be dry Friday, but rain is in the forecast for the rest of the weekend with a 20 percent chance Saturday afternoon and evening, meteorologist Daniel Huckaby said. The chance for thunderstorms on Sunday afternoon is 30 percent.

"It doesn't look like they will be severe, but any time during the spring and summer thunderstorms can be potentially violent," he said.

Online at:

<http://www.dallasnews.com/sharedcontent/dws/dn/latestnews/stories/060404dnmetstorms.22b96da49.html>